



Planning, Design and Access Statement

JH (Milton) Ltd and SGN Property Holdings Ltd

Former SGN gasholder site

March 2024

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1.0 Introduction

Background

- 1.1 This planning statement has been prepared by MJP Planning on behalf of JH (Milton) Ltd and SGN Property Holdings Ltd (the applicant). JH (Milton) Ltd is a subsidiary of Joseph Homes, the promoters of the transformative area of regeneration planned for Albion Waterside, which lies to the north of the application site and SGN are the owners of the site. The applicant is proposing to temporarily change the use of the former SGN gasholders site, on land East of Canal Road, Gravesend (the site) to open storage.
- 1.2 Full planning permission is sought for the following (the proposal):
“Temporary change of use to open storage (Class B8) with associated parking and cycle parking”
- 1.3 The principle of this use is fully supported by Gravesham’s adopted planning policies (Core strategy 2014) being in an employment area that is characterised by industrial uses. The proposal will provide an open storage use whilst plans are worked up by Joseph Homes as part of their wider redevelopment plans at Albion Waterside (Planning Application ref: 20210270). The application site is in the process of being acquired by Joseph Homes to comprise a later phase of the Albion Waterside development.
- 1.4 The application is supported by a suite of supporting documents, which should be read in conjunction with this planning statement. The full submission comprises the following:
 - Existing and proposed layout plans by JTP;
 - Flood Risk Assessment and Surface Water Drainage Strategy by PES;
 - Transport statement by SLR;
 - Air Quality Assessment by PES;
 - Ground Condition Desktop Study by Ground CC;
 - Noise Impact Assessment by ALN Acoustics; and
 - Planning, Design and Access Statement by MJP Planning.

2.0 Site description and planning history

Site description

- 2.1 The site is located on the east side of Canal Road and forms part of the wider Norfolk Road Industrial Estate in Gravesend. The site previously accommodated two gasholders that have since been decommissioned and the structures dismantled. The area surrounding the site is industrial in character, with a series of industrial buildings, warehouse buildings and structures, as well as areas of hard standing for lorry parking and open storage for various companies. The site is close to the southern embankment of the River Thames, just along from Gravesend town centre and Gravesend Canal basin.
- 2.2 To the west of the site are some residential properties along Suffolk Road, whose rear boundaries are along Canal Road. There are also further residential properties along Canal Road to the northwest within the Admirals Way housing estate.
- 2.3 The site is not in a conservation area and there are no statutory or locally listed buildings within the close vicinity of the site. The site is in Flood Zone 3a.

Planning history

- 2.3 There is no recent planning history on the Council website for the site in question.
- 2.4 The adjacent land to the north is also controlled by Joseph Homes and has a resolution to grant hybrid planning permission for a significant new neighbourhood comprising up to 1,500 new homes, elderly accommodation, 4,500 sqm of commercial space and associated infrastructure (Ref: 20210270).

3.0 Proposed development

- 3.1 This section is intended to be a high-level summary of the use on the site and should be read in conjunction with the detailed assessment set out within the accompanying reports.

- 3.2 The proposed description of development is:

“Temporary change of use to open storage (Class B8) with associated parking and cycle parking”

- 3.3 The permission is sought for a temporary period of three years which is expected to be secured through an appropriately worded planning condition.

Layout

- 3.4 The proposal is for a change of use to open storage (Class B8). The existing entrance will be the only access point into the site. As the proposal is for the use of the land the application is not accompanied by detailed site layout information as this will be dependent on the eventual occupier. The proposed site plan shows an indicative external storage area with racking systems.

External appearance

- 3.5 There are no buildings proposed although the proposed open storage use will be in keeping with surrounding industrial uses.

Access and parking

- 3.6 The proposals show an area of parking along the site frontage accommodating 10 parking spaces. Based on cycle standards two cycle parking spaces are required. The proposed layout includes space for 4 cycles within 2 Sheffield stands.

4.0 Considerations

- 4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of development;
- Impact on neighbouring amenity;
- Contamination;
- Transport and parking;
- Flood Risk; and
- Noise.

- 4.2 The Council's adopted Development Plan comprises The Gravesham Local Plan Core Strategy (2014), its accompanying Policy Map and the Gravesham Local Plan First Review (1994).

- 4.3 Each of the above issues is considered below.

Principle of development

- 4.4 The site is not allocated for any specific use on the adopted Core Strategy proposals map, constituting "white land" in planning terms. With the previous use of the site now redundant, the proposed open storage use is considered to be an appropriate use of the land in the short term, whilst plans for the redevelopment of the site are considered by Joseph Homes.
- 4.5 Section 5.1 of the Core Strategy recognises that Class B8 warehouse and distribution uses fall under the overall banner of "employment land".
- 4.6 Paragraph 81 of the NPPF notes that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 85 notes that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 4.7 Although there are no adopted policies in the Core Strategy that refer specifically to open storage, Policy CS07 of the Core Strategy gives particular support to the expansion of industrial and supporting employment uses. This is also echoed under the Gravesham Local Plan strategic objectives, specifically CS01 requires development to make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre, and at Ebbsfleet.
- 4.8 Policy CS02 states that the development strategy for the borough is to promote regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites.
- 4.9 The principle of the proposals should therefore be welcomed in planning terms.

Impact on neighbouring amenity

- 4.10 The proposed use has been assessed to understand the potential impact to the nearest noise-sensitive receptors being the housing on the opposite side of Canal Road which is at a distance of

approximately 24m from the site boundary at the nearest point. The application is accompanied by a noise impact assessment by ALN Acoustics that carries out this assessment.

- 4.11 A long-term survey has been carried out to record existing noise levels near to the site boundary, from which the baseline noise levels at the housing are established. Operational noise levels generated by the proposed use have been predicted, focussing on noise from activities typically associated with open storage usage and deliveries to and from the site. Estimated noise levels generated by vehicle maintenance and servicing are also included.
- 4.12 The report notes that the calculated noise level at the nearby housing does not exceed the existing baseline noise level. The introduced noise is not expected to differ significantly in character from the noise generated by the various other industrial sites in the immediate surrounding area. It is therefore concluded that the proposed change of use is unlikely to result in significant adverse noise impacts at the residential receptors.
- 4.13 In light of the above, and given the wider established use of the wider area for industrial purposes, it is not expected that there will be a material change to the living conditions of those living within close proximity to the site.

Contamination

- 4.14 The application is accompanied by a Ground Condition desktop study by GCC. The report should be reviewed in full by the relevant consultees but in summary it concludes that while the risks to site users are not likely to be significant, due to the dilution in outdoor air, a potential risk of ground gas generation and off-site migration remains. Further investigation of the ground gas generation potential of the Made Ground and potential for off-site migration is therefore recommended.

Transport and parking

- 4.15 Policy CS11 states that, as appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.
- 4.16 The application is accompanied by a transport statement (TS) which should be reviewed in full. The TS sets out that pedestrian access to the development site will be provided via the existing dropped kerb access. The site can be accessed by a range of non-car modes and that loading and unloading will be undertaken on-site to ensure that vehicles can turn and egress the site safely, in a forward gear.
- 4.17 The TS notes that the proposed B8 use generates a very low number of vehicle movements and therefore does not negatively impact the local highway network.
- 4.18 Based on the assessment outlined in the TS, it is concluded that the proposals accord fully with prevailing transport policy guidance and that the proposals are appropriate for this location.

Flood Risk

- 4.19 Policy CS18 states that Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime.
- 4.20 As set out in the Flood Risk Assessment, the site is in Flood Zone 3a and the development will incorporate a range of design measures to mitigate the flood risk. The proposed SuDS design strategy provides for mainly source control techniques of, permeable paving. Surface water will be discharged into the adjacent existing drainage ditch / watercourse. The SuDS provides a surface water management solution that reduces the surface water run off that leaves the site and shows that the proposed development does not result in an increase to the risk of flooding on or off site.

Air quality

- 4.21 The application is also accompanied by an air quality assessment, which concludes that the impact of any traffic generated by the new open storage proposals will have a negligible impact on the air quality within the local micro-environment, and will be further dispersed as traffic selects different routes away from the location and as such there are no air quality related issues that would impact the application as presented.

5.0 Conclusions

- 5.1 The proposal has been assessed against all of the relevant adopted and emerging planning policies and guidance and has judged to be acceptable in land use planning terms. The suite of supporting technical reports demonstrate that the proposal's impacts are immaterial or can be satisfactorily mitigated.

Benefits of the proposal

- 5.3 The key benefits the proposal delivers are:

- The provision of a new storage opportunity in a sustainable location;
- The re-use of a site that is underutilised for an employment use that is in keeping and compatible with the wider industrial use of the area; and
- The delivery of a new use on site that respects the surrounding context, complies with the Council's policies.

- 5.4 The proposal complies with Section 38(6) of the Planning Compulsory Purchase Act 2004 which states the determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Planning Statement has demonstrated that the proposal is in accordance with the development plan. Without prejudice to this, if conflicts with policy were judged to occur, the range of benefits highlighted above are deemed to significantly weigh in favour of justifying the conflicts. It is therefore considered that planning permission should be granted.